

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE STATE OF WASHINGTON,)
Plaintiff,)
vs.) No. 3:17-cv-05806-RJB
THE GEO GROUP, INC.,)
Defendant.)

30(B)(6) DEPOSITION UPON ORAL EXAMINATION
OF GEO GROUP, INC.
IN THE PERSON OF
RYAN KIMBLE

9:50 a.m.
July 9, 2018

1250 Pacific Avenue 105
Tacoma, Washington 98401-2317



REPORTED BY: JACQUELINE L. BELLOWS, CCR 2297



APPEARANCES

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1	I N D E X		
2	EXAMINATION BY:		PAGE
3	Ms. Baker -----		5
4			
5			
6	EXHIBITS FOR IDENTIFICATION		PAGE
7	Exhibit 1	Notice of Deposition Pursuant to Civil	10
8		Rule 30 (B)(6) And Demand for	
9		Designation of Representatives Deponent	
10		followed by GEO-State 000931	
11	Exhibit 2	Policy and Procedure Manual, Detainee	34
12		Services and Programs, Voluntary Work	
13		Program, GEO-State 003451 -	
14		GEO-State 003458	
15	Exhibit 3	Detainee Job Description, Cook/Prep/	37
16		Server, GEO-State 015099 - 015101,	
17		GEO-State 003524	
18	Exhibit 4	Detainee kitchen worker hygiene and	45
19		grooming standards, GEO-State 003519	
20	Exhibit 5	Kitchen Worker Orientation Checklist,	47
21		GEO-State 003538 - GEO-State 003556	
22	Exhibit 6	Daily Work Crew Count Sheet	69
23	Exhibit 7	Man-Days Billing Report Status Detail	70
24		Alpha, Report Dates: 11/1/2012 -	
25		11/30/2012, Confidential,	
		GEO MEN 00001594 - GEO_MEN 00001610	
	Exhibit 8	Food Service Shift Tool Control,	80
		GEO-State 003515 - GEO-State 003516	
	Exhibit 9	Offender Job/Program Assignments	101
	Exhibit 10	Memo, 11-29-12, GEO-State 000569 -	104
		GEO-State 000621	
	Exhibit 11	Certificate of Compliance, 3-6-17	105



1	EXHIBITS FOR IDENTIFICATION	PAGE
2	Exhibit 12 Housekeeping Plan, GEO-State 000632	106
3	GEO-State 000635	
4	Exhibit 13 Stipulated Protective Order, 6-26-18	110
5	Exhibit 14 Memo, 4-12-12, GEO-State 003477	111
6	Exhibit 15 Email, 10-3-14, GEO-State 012190	117
7	Exhibit 16 Email, 3-4-14, GEO-State 006270	120
8	Exhibit 17 5.8 Voluntary Work Program,	125
9	PBND 2011	
10	Exhibit 18 Facility History, GEO-State 005744	129
11	- GEO-State 005748	
12	Exhibit 19 Geo's Fed. R. Civ. P. 26(a)(1)	141
13	Initial Disclosures, 2-2-18	
14	Exhibit 20 Table, "Pod, Worker, Hours,	150
15	Total," Confidential	
16	Exhibit 21 Table, "Worker pay," Confidential	159
17	Exhibit 22 Table, "Monthly Voluntary Worker	163
18	Program Spend," Confidential	
19	Exhibit 23 Declaration of Joan K. Mell Attaching	170
20	Geo-ICE Contract with Limited Trade	
21	Secret Redactions, 11-17-17	
22		
23		
24		
25		



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Tacoma, Washington; July 9, 2018

9:50 a.m.

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RYAN KIMBLE,
sworn as a witness by the certified court reporter,
testified as follows:

E X A M I N A T I O N

BY MS. BAKER:

Q. Good morning, Mr. Kimble.

A. Good morning.

Q. As you know, my name is LaRond Baker and I'm
an attorney for the State of Washington in this matter.
Our other counsel who's at the table is Andrea Brenneke.
And we are here with Cassidy, who is our intern.

Would you please state your full name for the
record.

A. Ryan Edward Kimble.

Q. How do you spell your last name?

A. K-I-M-B-L-E.

Q. And your employer?

A. The Geo Group.

Q. And what is your position for the Geo Group?

A. I'm the associate warden for finance and



1 Q. How many sizes of units are there?

2 A. There is usually the A pod is the biggest pod.
3 And then it's -- the other two pods are basically equal.
4 It all fluctuates based on the number of detainees that
5 are brought in by ICE and the number of detainees that
6 are -- that ICE has said that they're to be either
7 transported back to their home country of origin or
8 released to the community.

9 Q. So the number of detainee-workers correlates
10 to the number of detainees that are housed in the pod?

11 A. Uh-huh.

12 MS. MELL: Is that yes?

13 A. Yes.

14 Q (By Ms. Baker) How does Geo make the
15 determination of how many workers will be assigned to a
16 pod based off of the pod population?

17 MS. MELL: Object to the form of the question.

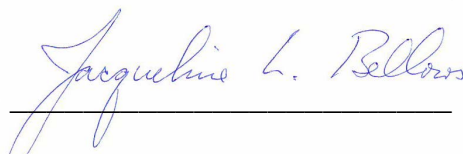
18 A. This was just used to give as many as
19 possible. This is just as-many-as-possible people,
20 'cause that was our mandate, try and provide as many as
21 possible opportunities for the detainees. So this is,
22 you know, these detainees, there could possibly be one
23 person doing the shower in the morning and a second
24 person doing the shower -- the same shower in the
25 afternoon, a third person doing the shower in the



REPORTER'S CERTIFICATE

I, JACQUELINE L. BELLOWS, the undersigned
Certified Court Reporter pursuant to RCW 5.28.010 authorized
to administer oaths and affirmations in and for the State of
Washington, do hereby certify that the sworn testimony
and/or proceedings, a transcript of which is attached, was
given before me at the time and place stated therein; that
any and/or all witness(es) were duly sworn to testify to the
truth; that the sworn testimony and/or proceedings were by
me stenographically recorded and transcribed under my
supervision, to the best of my ability; that the foregoing
transcript contains a full, true, and accurate record of all
the sworn testimony and/or proceedings given and occurring
at the time and place stated in the transcript; that a
review of which was requested; that I am in no way related
to any party to the matter, nor to any counsel, nor do I
have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this
27th day of July, 2018.



Jacqueline L. Bellows
Washington State Certified Court Reporter, No. 2297
jbellows@yomreporting.com

